

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

BRADLEY J. SCHAUFENBUEL; et al.,)	
)	
Plaintiffs,)	
)	Case No. 09-CV-1221
v.)	
)	
INVESTFORCLOSURES FINANCIAL,)	Judge Leinenweber
L.L.C.; et al.,)	
)	Magistrate Judge Nolan
)	
Defendants.)	

**PLAINTIFF JOHN REED IV'S RESPONSES AND OBJECTIONS TO DEFENDANT
SANCHEZ'S FIRST SET OF INTERROGATORIES**

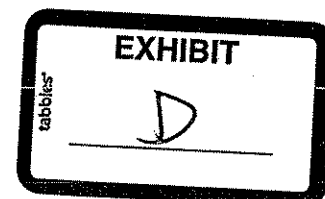
NOW COMES Plaintiff John Reed IV ("Reed4"), by and through his attorneys Thurston Law Offices, P.C. and Law Offices of Joel M Weiner, LLC, and pursuant to Fed.R.Civ.P. 33(b) hereby provides his responses and objections to Defendant Frank Sanchez's First Set of Interrogatories in this matter.

PRELIMINARY STATEMENT

All the responses contained herein are based only upon such information and documents which are presently available to and specifically known to Reed4 and disclose only those contentions which presently occur to Reed4. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in and variations from the contentions herein set forth. The following responses are given without prejudice to Reed4's right to produce evidence of any subsequently discovered fact or facts which Reed4 may later recall. Reed4 accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses are made, legal research is completed and contentions are made. The responses contained herein are made in good faith effort to supply as much factual information and as much specification of legal contentions as is presently known but should in no way be to the prejudice of Reed4 in relation to further discovery, research or analysis.

GENERAL OBJECTIONS

Each and every Interrogatory and Production Request is responded to, subject to the General Objections set forth below. These objections and limitations form a part of each and every Response and are set forth here to avoid the duplication and repetition of restating them for each Response. These General Objections may be specifically referred to in a Response to certain requests for the



purpose of clarity. However, the failure to specifically incorporate a General Objection should not be construed as a waiver of the General Objection.

Responses to these Interrogatories and Production Requests are subject to inadvertent or undiscovered errors, are based on and, therefore, are necessarily limited by the records and information still in existence, presently recollected and thus far discovered in the course of the preparation of the Responses. Consequently, Reed4 reserves the right to request withdrawal or amendment of the Responses if it appears at any time that omission or errors have been made therein or that more accurate information is available.

Responses to the Interrogatories and Production Requests shall not be construed as an admission by Reed4 of the relevancy, reasonableness, discoverability or admissibility of the information contained therein. Responses made subject to objection are made to demonstrate a good faith effort to respond to the Interrogatories and Document Requests and are not intended to constitute a waiver of any objection. Subject to the above, Reed4 sets forth the following General Objections:

1. Reed4 objects to the Interrogatories and Production Requests to the extent that they call for disclosure and/or production of information protected by the attorney-client privileges, work product doctrine, common interest doctrine or other applicable privileges, and will not disclose such information.

2. Reed4 objects to the Interrogatories and Production Requests to the extent that they seek information and/or documents that are not within their possession; to the extent that they seek discovery that is unreasonably cumulative or duplicative; to the extent that they are obtainable from some other source that is more convenient, less burdensome, and less expensive; and to the extent that they may otherwise be construed to require responses beyond those required by the Federal Rules of Civil Procedure and all applicable Local Rules.

3. Reed4 objects to the Interrogatories and Production Requests to the extent that they seek information and/or documents not relevant to the issues raised in this lawsuit and not reasonably calculated to lead to the discovery of admissible evidence. Nothing herein shall be construed as an admission by Reed4 respecting the admissibility or relevance of any fact or document, or as an admission of the truth or accuracy of any characterization or document of any kind requested by the Interrogatories or Production Requests.

4. Reed4 objects to each Interrogatory and Production Request which is not limited in time or which is not limited in time to the period which is at issue by the pleadings filed herein on the ground that it is overly broad, unduly burdensome and oppressive, and seeks documents neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

5. Reed4 objects to the Interrogatories and Production Requests to the extent that they are vague, ambiguous, overly broad, unduly burdensome or oppressive.

6. Reed4 objects to the Interrogatories and Production Requests as unduly burdensome and oppressive, insofar as they seek information and/or documents already in propounding party's possession and/or control.

7. Reed4 objects to the Interrogatories and Production Requests to the extent that information contained in documents is proprietary and/or confidential business information or trade secrets, the disclosure of which would provide an unfair business advantage and allow unfair competition.

8. Reed4 objects to the Interrogatories and Production Requests as being unduly burdensome and speculative to the extent that they request that Reed4 produce information and/or documents supporting their contentions prior to the completion of discovery.

9. Reed4 objects to the Interrogatories and Production Requests to the extent that they seek information and/or documents relating to the drafting history, negotiations, and/or prior interpretations of any agreements or contracts at issue in this litigation on the ground that the language of such documents is clear and unambiguous and the terms and conditions speak for themselves, as any such requests are overly broad and seek information and/or documents which are not relevant to the subject matter involved in this action and which would be unduly burdensome to produce.

10. Reed4 objects to propounding party's definition of "IFC Entities" on the basis that the identity(ies) of their "divisions, officers, partners, directors, consultants, employees, agents, representatives, attorneys, and all persons acting or purporting to act on its behalf" is information more readily available to propounding party than to Reed4. Reed4 will interpret this term as meaning only the legal entities, Frank Sanchez and Jim Bourassa.

11. Reed4 objects to propounding party's definition of "Complaint" on the basis that no Third Amended Class Action Complaint has been filed in this matter. Reed4 will interpret this term as meaning the Second Amended Class Action Complaint, Document #58.

12. Reed4 objects to propounding party's definition of "E-mail" on the basis that vague, ambiguous, overly broad, unduly burdensome and oppressive. Further, Reed4 objects on the basis that the term "CFTC" is undefined, vague and completely unrelated to this litigation.

13. Reed4 objects to propounding party's instruction #26 to the extent that it exceeds the requirements of Federal Rule of Civil Procedure 26(b)(5).

14. Reed4 objects to propounding party's instruction #27 as it purports to allow propounding party to misinterpret, misapply and/or answer on behalf of Reed4. Instead, when Reed4 references a person or entity by name, Reed4 means only that specific person or entity, especially given that Reed4 is unable to make representations as to other persons' or entities' "agents, employees or attorneys and the entity's subsidiaries, affiliates, merged, consolidated or acquired predecessors, divisions and holding or parent companies, including present and former officers, directors, shareholders, agents, employees and attorneys."

15. Reed4 objects to propounding party's instruction #28 as it purports to alter the Federal Rules of Civil Procedure and caselaw regarding objections to discovery. Reed4 specifically declares that it does not waive any objection and if any objection is inadvertently omitted, that Reed4 may supplement these responses and objections at any time prior to trial and assert any inadvertently omitted response or objection.

ANSWERS AND OBJECTIONS TO INTERROGATORIES

INTERROGATORY No. 1: Identify, pursuant to the instructions set forth above, any statements made by any person relating to the allegations contained in the Complaint against any of the Defendants, and as to each of those statements, state the following:

- (a) The date or dates of such statement;
- (b) The place of such statements;
- (c) The matters and things stated by the person in the statement;
- (d) Whether the statement was oral, written, and/or recorded;
- (e) Whether the statement was witnessed by anyone, and if yes, who; and

RESPONSE: Reed4 objects to this Interrogatory on the basis that the phrase "any statements made by any person relating to the allegations contained in the Complaint against any of the Defendants" is vague, ambiguous, overly broad, unduly burdensome and oppressive. These questions are more properly reserved for the deposition of Reed4. Subject to and without waiving any objection, Reed4 states that responsive documents will be produced pursuant to Rule 33(d). Answering further, Reed 4 responds:

Unknown date phone conversations with IFCF: Properties in Mexico being marketed by Remax, Exit Realty, Berden & Warner. United Funds Technology is a potential investor, possibly committed. Mexico property is 18,000 acres with 13 miles of ocean front.

IPO scheduled for July 6?, in Mexico?

Unknown date phone conversations with Frank, Jim, and Scott Slagle (all within a short time frame): Scott says lots selling slower than anticipated. Jim says there is plenty of interest in the lots and that IFCF investor accounts were not frozen.

IFCF is offering 7% commission for agents. IFCF personnel are foregoing their salaries.

Funding is coming from financing and lot sales. Financing is used to put in utilities so lots can be sold. Scott Slagle said that lots were selling slowly and that investor accounts were frozen for 6 months due to cash flow shortage caused by a lender who backed out due to perceived risk. Next day Jim said the lots were selling fine, that accounts were not frozen, and that IFCF provided an incentive for leaving money in. Around this time Scott Slagle was calling investors asking for more money.

Unknown date phone conversation with Frank: Letter of Credit from venture capital investor is pending. Cash for investors within 30 days. VC investor to invest 2.74 billion. Land sale pending on letter of credit. Will have less than 1 million for investors.

Unknown date phone conversation with Frank: Hyatt, Marriott, Sandals, and 4 Seasons are interested in putting properties in at the Sands of Gold. Frank is selling a property for 4 million and will close in March, hoping for March 15. 2 million reserved to cash out investors. – my notes contain a reference to a Jim Sweeney.

04/11/2008 phone conversation with Frank: Bridge loan pending. I personally will get funds disbursed from these loan proceeds in 30 days. Frank will know this for sure in 3 days. Call back in 3 days. Master funding is 120 days out.

04/15/2008 phone conversation with Frank: Update is coming out tomorrow morning. Frank needs to fix grammatical errors in the contract. Frank meeting tomorrow with loan funder to discuss the 1st draw on the letter of credit. Once loan funder sees that the 1st draw is lined up, the lender will disburse funds – 30 days max before funds are disbursed.

05/08/2008 phone conversation with Frank: Frank will close on the bridge loan 30 days from 05/13/2008, and have funds to disburse to investors. Dept 08 meeting for investors in Chicago tentative – considering using the Comfort Inn.

08/07/2008 phone conversation with Frank: Standby Letter of Credit was received by JP Morgan & Bank of Saigon was also interested in funding the project.

10/03/2008 phone conversation with Frank: Master funder is about 3 months out – they were sent about 400 pages from IFCF to review. Funds from Tyler deal should come thru in 30 – 45 days & investors will receive proceeds from this transaction.

01/21/2009 phone conversation with Frank: Standby letter of credit from an AAA rated euro bank for 100 million. IFCF was allowed to lapse and dissolve due to the registration costs – renewing it is low priority. IFCF is none the less still active. I asked Frank to give the investors a lien on the Mexico property or issue preferred shares from the Mexico company. Frank provided the names of the board

members. Leo (Delgotto?) is the point of contact at the master funder. Frank offered me a position of the board of directors. I did not accept.

INTERROGATORY No. 2: Identify, pursuant to the instructions set forth above, all persons who have personal knowledge of alleged wrongful acts by any of the Defendants concerning the matters at issue in this litigation.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies all parties to this case, all witnesses identified on Exhibit A, and all investors identified on Exhibit B attached hereto. Reed4 also directs propounding party to documents being produced. Investigation continues.

INTERROGATORY No. 3: Identify, pursuant to the instructions set forth above, any statements, information and/or documents known by you and requested herein or any Defendant that you claim to be work product or subject to any common law or statutory privilege, and with respect to each request, specify the legal basis for the claim of privilege.

RESPONSE: Reed4 objects to this Interrogatory on the basis that it is overly broad, unduly burdensome and purports to require Reed4 to recollect every oral communication that may be subject to a relevant privilege. Subject to and without waiving any objection, Reed4 answers: Any documents or portions thereof that are subject to a privilege are so identified by redactions or, if subject to the attorney-client privilege, are withheld in their entirety. I am not aware of any information beyond the contents of the discussions of the case with my attorney that would be considered privileged information.

INTERROGATORY No. 4: Identify, pursuant to the instructions set forth above, each numbered paragraph in the Complaint that you have personal knowledge of the allegations contained in the paragraph.

RESPONSE: Reed4 objects to this Interrogatory on the basis that it is overly broad, unduly burdensome and attempts to invade upon the attorney-client and work product privileges. Subject to and without waiving any objection, Reed4 identifies: 1,2,4,6,7,9,13,14,17,18,19,20,21,27,28,29,30,31,32,33,35,36,37,38,39,40,41,42, 43,45,47,48,49,51,55,56,58,60,61,62,63,64,65,66,67,68,69,70,71,72,73,75,79,87, 88,89,91,92 (sometimes),93,94,95,96,98,99,100,101,102,103,104.

INTERROGATORY No. 5: Identify, pursuant to the instructions set forth above, each individual that solicited you to invest in any of the alleged securities identified in the Complaint, and for each such person identify the security solicited.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: Scott Wessel: IFCF securities; Scott Slagle: IFCF and IFCV securities; Jim Bourassa:

IFCF & IFCV securities, SOP investment with warrants; Frank Sanchez: IFCF & IFCV securities, SOP investment with warrants. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 6: Identify, pursuant to the instructions set forth above, any meetings or telephone conversations you had with Sanchez.

RESPONSE: Subject to and without waiving any objection, Reed4 refers propounding party to his answers to Interrogatory No. 1.

INTERROGATORY No. 7: Identify, pursuant to the instructions set forth above, any meetings or telephone conversations you had with Bourassa.

RESPONSE: Subject to and without waiving any objection, Reed4 refers propounding party to his answers to Interrogatory No. 1. In addition, Reed4 identifies: Many undocumented phone conversations. Jim once said "I wouldn't be involved with this if it were a scam." (or words to that effect)

INTERROGATORY No. 8: Identify, pursuant to the instructions set forth above, an account you had with any of the Defendants.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: IFCF account #204017 – later transferred to IFCV, then to the SOP. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 9: Identify, pursuant to the instructions set forth above, any investments you had with any of the Defendants, and for each investment, identify the investment, the amount of funds invested in the investment, and the dates you deposited or handed over any funds for the investment.

RESPONSE: Subject to and without waiving any objection, Reed4 directs propounding party to documents being produced.

INTERROGATORY No. 10: Identify, pursuant to the instructions set forth above, any funds received from any of the Defendants, and for each receipt of funds, identify the amount of funds received, who you received the funds from, when you received the funds, describe why you received the funds.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: I received IFCF monthly income generator payouts for 2 years according to the contract. When my term was up, I withdrew my principal. I later reinvested more than the principal in IFCV in increments of \$40,000, \$40,000, \$10,000, and never

saw the money or proceeds again. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 11: Identify, pursuant to the instructions set forth above, each date you attempted to redeem your investments, as alleged in Paragraph 123 of the Complaint, and for each attempt, describe whether the attempt was made in writing or orally.

RESPONSE: Subject to and without waiving any objection, Reed4 refers propounding party to his answers to Interrogatory No. 1. In addition, Reed4 states: Oral attempts listed above. Written withdrawal requests that were not honored were made on 01/20/2007 for \$175,519.36, and on 05/08/2008 for \$160,000. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 12: Identify, pursuant to the instructions set forth above, the individual(s) that told you that you had to execute a Withdrawal Request Form, as alleged in Paragraph 124 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 states not applicable. Reed4 directs propounding party to documents being produced.

INTERROGATORY No. 13: Identify, pursuant to the instructions set forth above, the individual(s) that refused your attempt to collect your balance, as alleged in Paragraph 125 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: Frank Sanchez and Jim Bourassa both told me on numerous occasions that my funds would be delivered to me shortly, usually a few weeks to a few months. I would call back after the time elapsed and they would have a new time frame, and a new excuse. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 14: Identify, pursuant to the instructions set forth above, the individual(s) told you to "roll over" or reinvest your investment, as alleged in Paragraph 127 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: I was not told to do so, it was offered. I was not aware of the fraud when I agreed to this, and believed that the "temporary cash flow problem" would soon be resolved via financing and the sale of lots on the Mexico property as was represented to me by Jim Bourassa and Frank Sanchez.

INTERROGATORY No. 15: Identify, pursuant to the instructions set forth above, each banking institution alleged in Paragraph 133 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies the following banks: Bank of America (Woodstock and Lake in the Hills, IL branches); Harris Bank (Woodstock, IL branch); State Bank of Paw Paw; Elgin State Bank; United Community Bank n/k/a Park National Bank; Banco Santander Serfin SA (Mexico); and BBVA Bancomer (Mexico). Contact information for these banks is contained in Exhibit A attached hereto. Responsive documents will be produced pursuant to Rule 33(d). Investigation continues.

INTERROGATORY No. 16: Identify, pursuant to the instructions set forth above, the individual(s) that told you that you had to roll over or transfer your securities or you would lose your entire investment, as alleged in Paragraph 137 of the Complaint.

RESPONSE: Subject to and without waiving any objection, states not applicable. Reed4 directs propounding party to documents being produced.

INTERROGATORY No. 17: Identify, pursuant to the instructions set forth above, the individual(s) that made the alleged "false and fraudulent representations" to you, as alleged in Paragraph 140 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: Scott Slagle, Scott Wessel, Frank Sanchez, and Jim Bourassa. Also, Darcey Martin's account statements and payout dates were fraudulent. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 18: Identify, pursuant to the instructions set forth above, the individual(s) that fraudulently represented to you "that investors had such ownership interest and could demand the return of their investment at any time," as alleged in Paragraph 142 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: Frank Sanchez and Jim Bourassa. Reed4 refers propounding party to his answers to Interrogatory No. 1. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 19: Identify, pursuant to the instructions set forth above, the specific amount of damages you suffered from each one of the Defendants.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: \$90,000 in principal lost. My entire investment, according to statements produced by Darcey Martin and authorized by Frank Sanchez showed my account worth \$450,000 + the value of the warrants. Frank Sanchez, Darcey Martin, Jim Bourassa, Scott Slagle, and Scott Wessel were all involved with soliciting my initial

investment and additional funds. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 20: Identify, pursuant to the instructions set forth above, the individual(s) that made the "false statement of material facts" to you, as alleged in Paragraph 189 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 refers propounding party to his answers to Interrogatories Nos. 17 and 21. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 21: Identify, pursuant to the instructions set forth above, the individual(s) that falsified the purpose of the investments to you, as alleged in Paragraph 201 of the Complaint.

RESPONSE: Subject to and without waiving any objection, Reed4 identifies: All communication indicated that my funds were going into real properties. Based on my interpretation of the website and other information, I expected to receive a note showing myself as a partial lien holder, or other recorded security instrument. This communication was provided primarily in writing. Reed4 also directs propounding party to documents being produced.

INTERROGATORY No. 22: Identify, pursuant to the instructions set forth above, the individual(s) that purchased assets for their own use and the asset purchased, as alleged in Paragraph 205 of the Complaint.

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

INTERROGATORY No. 23: Identify, pursuant to the instructions set forth above, the individual(s) who made the "false Representations" and "lies" to you, as alleged in Paragraph 206 of the Complaint, and identify each such representation or lie and the date each such representation or lie was made by the individual(s).

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

INTERROGATORY No. 24: Identify, pursuant to the instructions set forth above, the individual(s) who transferred your investments and assets to Mexico, as alleged in Paragraph 209 of the Complaint, and identify each such investment and asset and the date and method of the alleged transfer.

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

INTERROGATORY No. 25: Identify, pursuant to the instructions set forth above, the individual(s) who transferred their personal assets to relative or other companies, as alleged in Paragraph 210 of the Complaint, and identify each such asset and the person or entity that received the transfer.

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

INTERROGATORY No. 26: Identify, pursuant to the instructions set forth above, the individual(s) who took your money and concealed it in Mexico, as alleged in Paragraph 226 of the Complaint.

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

INTERROGATORY No. 27: Identify, pursuant to the instructions set forth above, the investments you made in any real estate or development project in Mexico, as alleged in Paragraph 230 of the Complaint.

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

INTERROGATORY No. 28: Identify, pursuant to the instructions set forth above, the individual(s) who made the "false representations" to you, as alleged in

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Paragraph 239 of the Complaint.

RESPONSE: Reed4 objects to this interrogatory and refuses to respond on the basis that, because Interrogatory No. 1 contains five (5) discrete subparts, it exceeds the limit of 25 interrogatories allowed under Federal Rule of Civil Procedure 33(a) and for which neither Reed4 has stipulated nor has the propounding party sought leave of court.

VERIFICATION

I, John Reed IV, Plaintiff in this matter, state that, pursuant to Federal Rule of Civil Procedure 33(b)(5) and the penalties of perjury, the foregoing answers to interrogatories are true and correct to the best of my knowledge and belief.



John Reed IV

ATTORNEY SIGNATURE AS PER RULE 33(b)(5)

PLAINTIFF JOHN REED IV

By: /s/ Robert C. Thurston
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Robert C. Thurston, an attorney, hereby certify that I served a copy of these Responses and Objections to Defendant Frank Sanchez's First Set of Interrogatories upon all persons on the Service List below by causing the same to be sent via email on August 27, 2009.

By: /s/ Robert C. Thurston

SERVICE LIST

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Schaufenbuel, et al. v. InvestForClosures Financial, LLC, et al.

Case No. 09-cv-1221

Witness List Identified by Plaintiffs

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Woodstock, IL 60098

Edward A. Sulkson
26W353 Menomoni Dr.
Wheaton, IL 60187-7987

John C. Loudon
10525 Windsor Park Dr.
Alpharetta, GA 30022-1014

Integra Realty Resources
5718 Westheimer, Suite 1100
Houston, TX 77057
713-243-3333
www.irr.com

Integra Realty Resources, Inc.
1133 Ave of the Americas, 27th Fl
New York, NY 10036
212-255-7858
www.irr.com

A W Allen & Co.
OH investors Szili, Michelina
8031 E Market St Ste B
Warren, OH 44484-2200
330-856-2882

Brandy Marine Int'l., LLC
1743 Independence Blvd. Ste. D8
Sarasota, FL 34234-2145
941-360-1015
www.brandymarine.com

Faithful+Gould
222 S. Riverside Plaza Ste 2240
Chicago, IL 60606-6111
312-655-8510
www.fgould.com

Renaissance Golf Design, Inc.
Doak Golf
530 E. 8th St.
Traverse City, MI 49686-2629
231-941-7499
www.doakgolf.com

Willow Creek Community Church
67 East Algonquin Road
South Barrington, IL 60010-6132
847-765-5000
www.willowcreek.org

Jonathan A. Pikoff
Pikoff & Assocs.
2437 South Blvd, Suite 14
Houston, TX 77098-5128
713-408-9702
www.pikofflaw.com

Jose Paschal
Architect

Fedele & Associates
7618 Tapper Avenue
Hammond, IN 46324-3021
219-781-7618
www.fedeleandassociates.com

Precision Construction
305 E 3rd St
Ocilla, GA 31774-1852
229-468-5717
www.precisionhomes.biz

The Int'l Lending Group Ltd.
92-6024 Kohi Street
Kapolei, HI 96707
888-983-8882
theinternationallendinggroup.com

Dellovo Financial Corp.
44 Mall Road
Burlington, MA 01803-4536

Millenium Radio New Jersey
101.5 Radio
PO Box 5698
Trenton, NJ 08638-0698
www.nj1015.com

United Community Bank
n/k/a Park National Bank
1026 Ogden Ave.
Lisle, IL 60532
630-724-0100
www.parknatl.com

Nick Mustafa

Charles Schwab Corp.
101 Montgomery St.
San Francisco, CA 94104-4151
415-636-7000
www.aboutschwab.com

Quantum Aether Dynamics Instit
2302 Randall Rd., Suite 242
Carpentersville, IL 60110
www.16pi2.com

Delia Lazar
Blue Sky MLS, Inc.
301 Route 17 North
Rutherford, NJ 07070-2575
800-232-5837
www.blueskymls.com

Anthony LaRock
American Capital Holdings, LLC
1607 East Big Beaver Rd, Ste. 101
Troy, MI 48083-2067
www.amcapholdings.com

Brian Kelly
Effective Trading LLC
175 W. Jackson Blvd., Suite 1650
Chicago, IL 60604
312-939-8040

Amber Sky Mortgage Solutions
500 Route 17 South, Suite 207
Hasbrouck Hts., NJ 07604-xxxx
866-955-5655
www.amberskymms.com

Adam M. D'Amelio
973-277-5029

Infiniti Investments

JP Morgan Chase
10 S. Dearborn
Chicago, IL 60670-0001
www.chase.com

Banco Santander Serfin SA
Av. Costera Miguel Aleman No. 51,
Fracc. Club Deportivo, C.P.
Acapulco Guerrero, MX 39690
www.santander.com.mx

BBVA Bancomer
Av. Costera Miguel Aleman No. 123
Acapulco Guerrero, MX 39670
www.bancomer.com.mx

Dario C. Zanichelli
Cumberland Accounting Svcs.

Cumberland Accounting Svcs.
n/k/a Chicagoland CPAs
4501 N. Cumberland Avenue, Suite C
Norridge, IL 60706
708-456-2727
dario@cpa-in-chicago.com

Larry Goldberg
11510 E Main St
Huntley, IL 60142-7393
847-659-1900
homesavingsofamerica.com

AW Allen & Co
8031 E Market St
Warren, OH 44484-2200
330-856-2882

Schaufenbuel, et al. v. InvestForClosures Financial, LLC, et al.

Case No. 09-cv-1221

Investor List Identified by Plaintiffs

EXHIBIT B

PLEASE NOTE THAT INVESTORS ON THE LIST BELOW ARE POTENTIAL CLASS MEMBERS. THE CLASS, AS PROPOSED BUT NOT YET APPROVED, IS DESCRIBED AS FOLLOWS: ALL PERSONS WHO INVESTED MONEY WITH SANCHEZ AND ANY OF THE IFC ENTITIES DURING THE PERIOD JULY 1, 1999 THROUGH DECEMBER 31, 2008 . . . EXCLUDED FROM THE CLASS IS ANY DEFENDANT AND ANY MEMBER, OFFICER OR DIRECTOR OF DEFENDANTS.

PLEASE NOTE THAT DEFENDANTS AND/OR THEIR COUNSEL ARE NOT PERMITTED TO CONTACT ANY INVESTOR UNLESS SUCH PERSON IS A DEFENDANT TO THIS ACTION, HAS CONSENTED TO SUCH CONTACT IN WRITING AFTER APPROPRIATE DISCLOSURES, OR IS CONTACTED IN THE PRESENCE OF PLAINTIFFS' COUNSEL.

Alvin & Mary Akagi
51311 North View
Plymouth, MI 48170
734-354-9628
Est. Investment Total = \$216636.1

Graciela Andrade-Lopez
512 N McClurg Ct
Chicago, IL 60611
312-731-7972
tauro1959@hotmail.com
Est. Investment Total = \$0

Liam Angelini
452 SW 158 Terrace
#204
Pembroke Pines, FL 33027
langlum@yahoo.com
Est. Investment Total = \$35000

Angiras Arya
Kani M. Ilangovan
166 Hampshire Drive
Plainsboro, NJ 8536
609-712-2808
kaniilangovan@yahoo.com
Est. Investment Total = \$30000

Brad & Linda Bebout
1215 Polaris Parkway
#197
Columbus, OH 43240
614-784-1899
bebout98@yahoo.com
Est. Investment Total = \$89998.94

Dan & Josie Becker
809 Tangigoot Dr.
Aztec, NM 87410
505-334-9054
Est. Investment Total = \$3600

Christine Blume
120 E. Bonefish Cir.
Jupiter, FL 33477-7234
702-353-9301
drchristineblume@comcast.net
Est. Investment Total = \$101046.94

Gary Bollier
11457 Regency Lane
Carmel, IN 46033
317-575-0654
gbollier@wiley.com
Est. Investment Total = \$160000

Sean Brady
5032 Poly Drive
Billings, MT 59106
406-670-1282
sdb Brady@bigplanet.com
Est. Investment Total = \$2500

Richard Burge
871 W. Highland
Elgin, IL 60123
847-742-9260
burgerichard@hotmail.com
Est. Investment Total = \$125000

Joseph Cavaluzzi
1602 SW Cefalu Cir
Port St. Lucie, FL 34953
772-408-8182
jcavaluzzi@yahoo.com
Est. Investment Total = \$47950.97

Penny Chance
14105 Kendalwood Dr.
Upper Marlboro, MD 20772
301-574-0637
chancep@dsmo.com
Est. Investment Total = \$55000

Hee Ja Chung
Est. Investment Total = \$10000

Helen Clark
1990 Killarney Dr. SE
Bellevue, WA 98004
425-454-5654
helensclark@gmail.com
Est. Investment Total = \$138995.86

Richard Clark
1990 Killarney Dr. SE
Bellevue, WA 98004
425-454-5654
Est. Investment Total = \$387981.74

Roberta Clark
14909 Oakbury Drive
La Mirada, CA 90638
714-670-7855
rcoyoter@aol.com
Est. Investment Total = \$70000

Michael Clay
PSC 80 Box 11623 APO AP
, 96367
michael.clay@kadena.af.mil
Est. Investment Total = \$8559.6

Lorenzo Coleman
Est. Investment Total = \$2500

Connelly
Est. Investment Total = \$0

Peter Correia
9 Meeson Street
Fall River, MA 2724
508-679-8995
peter@fallriveronline.com
Est. Investment Total = \$2518.12

Shirley Crider
1808 Irvin Rd
Elida, OH 45807
419-331-4492
scrider1@woh.rr.com
Est. Investment Total = \$10000

Olivier Crisostomo
2432 Green Hollow Court
Conyers, GA 30012
ocrisostomo@hotmail.com
Est. Investment Total = \$0

Frank Cupp
60 S. Outer Drive
Vienna, OH 44473
330-856-3919
tbanyasjr@neo.rr.com
Est. Investment Total = \$20000

Mary Czaja
22122 Little Lagoon Court
Lutz, FL 33549
813-909-9596
Est. Investment Total = \$2500

Denhart
Est. Investment Total = \$0

Eilene & Eugene Ehrhardt
710 Cloverlane Dr
Sycamore, IL 60178
815-895-5587
eilenegail@tbcnet.com
Est. Investment Total = \$50000

Carol Fenwick
114 Wendel Pl
Dekalb, IL 60115
815-758-5223
Est. Investment Total = \$10000

Tom Fitzgerald
4108 N. Kenmore
2N
Chicago, IL 60613
773-477-7160
Est. Investment Total = \$75000

Sherri Foster
6235 Gault Rd
Canfield, OH 44406
330-654-3035
Est. Investment Total = \$78211.87

Joseph Fraga
34056 MacMillan Way
Fremont, CA 94555
510-796-9070
jlfraga@sbcglobal.net
Est. Investment Total = \$0

Earl Gisewhite
195 Wall St
Cortland, OH 44410
330-638-5603
Est. Investment Total = \$54944.92

Madeline Gisewhite
195 Wall St
Cortland, OH 44410
330-638-5603
Est. Investment Total = \$0

Kailash & Kanta Gupta
9218 Sandylake Cir
Gaithersburg, MD 20879
301-963-2760
kailashkailashgu@aim.com
Est. Investment Total = \$40000

Natasha Gupta
9218 Sandylake Cir
Gaithersburg, MD 20879
301-963-2760
kailashkailashgu@aim.com
Est. Investment Total = \$65000

Nishant Gupta
9218 Sandylake Cir
Gaithersburg, MD 20879
301-963-2760
kailashkailashgu@aim.com
Est. Investment Total = \$67000

Earl & Mary Ann Gurnack
6009 Cypress Point
Sanford, NC 27332
919-499-9834
egurnack@aol.com
Est. Investment Total = \$100000

Dave Hale
708 Glendale Ave
Rockford, IL 61108
779-348-5427
touchdownfun@gmail.com
Est. Investment Total = \$10000

Wilhelm Hall
237 Rock Ave
Park Ridge, NJ 7656
201-307-8746
wilhelm.hall@bmwna.com
Est. Investment Total = \$86008.43

Ruth Halverson
19 Pier Pointe
New Bern, NC 28562
252-638-8630
tobyh2@suddenlink.net
Est. Investment Total = \$95000

Chris & Patricia Hand
1823 Fort Washington Ave
Maple Glenn, PA 19002
212-654-5225
Est. Investment Total = \$11000

Gary Hartwig
19 Ringwood Ln
Hewitt, NJ 7421
973-728-8055
ghart100k@yahoo.com
Est. Investment Total = \$5000

Paul Herink
291 Frank Applegate Rd
Jackson, NJ 08527-4215
732-928-8314
paul.herink@us.army.mil
Est. Investment Total = \$30476.6

Beverly Hoover
Est. Investment Total = \$15000

Thomas Jackson
3835 W. 800 N.
Cedar City, UT 84720
435-586-7058
tjackson@netutah.com
Est. Investment Total = \$10000

Victor Jackson
3264 Timber Ridge
College Park, GA 30349
770-969-5713
vetjackson@aol.com
Est. Investment Total = \$10000

Ravikumar + Sumathi Jammalamadaka
5 Amy Dr
North Brunswick, NJ 08902-5542
732-951-3971
j_ravik@yahoo.com
Est. Investment Total = \$100000

Andrew Kaufman
4680 Green Bridge Ln
Hanover Park, IL 60133
630-540-2641
ajkaufman@hotmail.com
Est. Investment Total = \$35000

Hong Ja (Sean) Kim
8913 Heathwood Cir
Niles, IL 60714
Est. Investment Total = \$10000

Patricia Knoll
3024 Turner's Meadow Rd.
Pensacola, FL 32514
850-384-3416
pknoll16@hotmail.com
Est. Investment Total = \$8000

Stuart Knoll
201 Arrowhead Court
Winter Springs, FL 32708
407-359-0618
Est. Investment Total = \$7500

G. Matthew Knowlton
6a Clover Court
Raymond, NH 03077-2021
bigguy8230@yahoo.com
Est. Investment Total = \$17000.01

Sriram Krismnamachari
1350 Fox Chase Rd
Bartlett, IL 60103
630-483-1778
Est. Investment Total = \$10000

Rex Krivanek
1160 Lynhurst Way
San Jose, CA 95118
408-204-3305
t11rex@comcast.net
Est. Investment Total = \$30000

William A. & Sarah Lawson
10407 NE 22nd Place
Vancouver, WA 98686
360-576-4021
wi.lawson@comcast.net
Est. Investment Total = \$109207.74

Maria Teresa Leon
2728 Beech Ave
McAllen, TX 78501
956-451-7905
adalberto_ramirezjr@yahoo.com
Est. Investment Total = \$32700

Robert Levy
44126 Paseo Padre Pkwy
Fremont, CA 94539
510-498-4443
Uruguay50@aol.com
Est. Investment Total = \$200000

Mark & Denise Lincoln
3701 Glasgow Dr.
Plano, TX 75025
Est. Investment Total = \$183000

Kathleen Markus
75A Chatham Drive
Monroe Twp, NJ 8831
609-409-7991
kmarkus486@yahoo.com
Est. Investment Total = \$265000

Emilio & Jo Marsilio
4419 Fitzgerald
Youngstown, OH 44515
330-792-7912
Est. Investment Total = \$40000

Ann Martin
5538 London Ct
Youngstown, OH 44515
330-799-5107
annmartin52@yahoo.com
Est. Investment Total = \$24488.91

Judd & Darcey Martin
9507 Waterford Oaks Blvd
Winter Haven, FL 33884
863-875-1220
darcey.martin@d2dsolutions.com
Est. Investment Total = \$35075.6

Glen & Jacquelyn Mason
407 S. Wellwood Ave
Lindenhurst, NY 11757
631-957-0685
jemma42@optonline.net
Est. Investment Total = \$35000

Spencer Mathews
1763 Summit Dr
Escondido, CA 92027
760-746-9538
smathews@ucsd.edu
Est. Investment Total = \$50000

Philip Meegan
820 Forrest Dr SE
Cleveland, TN 37323
Est. Investment Total = \$42000

Mehta
Est. Investment Total = \$0

Anastazia Michajewicz
2823 9th St
Rockford, IL 61109
815-226-0305
Est. Investment Total = \$13600

Clyde & Peggy Moar
104 Goldspur Way
Brentwood, CA 94513
925-240-5431
moarcmoar@sbcglobal.net
Est. Investment Total = \$70000

Rex Moar
40 Woodland Dr
Alamo, CA 94507
925-939-4257
bruinboys@sbcglobal.net
Est. Investment Total = \$120000

Jorge Mota Ramirez
24 North Oak St
Crystal Lake, IL 60014
815-455-9497
tauro1950@hotmail.com
Est. Investment Total = \$0

Alvin Murashige
40 West 10th St
Lovell, WY 82431
808-295-7317
milehial@juno.com
Est. Investment Total = \$1000000

Ianhong (Shelly) Ng
American Mass Media
207 East Ohio Street
218
Chicago, IL 60611
312-363-8422
shelly@shellyshelly.com
Est. Investment Total = \$70000

Laura Noffsinger
43903 Brandywyne St
Canton, MI 48187
734-455-5324
laura_noffsinger@peoplesoft.com
Est. Investment Total = \$50000

Marjorie Noffsinger
102 E. Ripley St
West Branch, MI 48661
989-345-3827
Est. Investment Total = \$0

Rafael & Dolores Nunez
10214 Algonquin Rd
Huntley, IL 60142
847-669-0722
Est. Investment Total = \$5000

Curtis & Stacy O'Dell
506 Wills Point Ct
Allen, TX 75013
214-616-0853
curtisod@airmail.net
Est. Investment Total = \$100000

Temitope Ogundare
Peregrine Semiconductor
9380 Carroll Park Dr.
San Diego, CA 92121
858-795-7343
togundare@psemi.com
Est. Investment Total = \$67500.07

Joshua Ortego
832 Quinnipiac Ave
New Haven, CT 06513-3338
abcjosh@yahoo.com
Est. Investment Total = \$100000

Richard Ortiz
1749 Gleason Ave
Bronx, NY 10472
914-736-1558
rtonet@hotmail.com
Est. Investment Total = \$25000

Daniel O'Sullivan
4655 Landau Pl.
Rockford, IL 61114
815-633-5633
greatsavingscb@comcast.net
Est. Investment Total = \$3000

Patrick O'Sullivan
4655 Landau Pl.
Rockford, IL 61114
815-633-5633
greatsavingscb@comcast.net
Est. Investment Total = \$4000

Sean & Tiffany Page
6347 State Road
227 N
Richmond, IN 47374
765-965-2741
powerhere@earthlink.net
Est. Investment Total = \$323395.38

James & Lori Pastorino
14608 Redford Dr.
Sterling Heights, MI 48312
586-268-6275
jimpastorino@yahoo.com
Est. Investment Total = \$100000

Jonathan Patton
4021-C Camellia Drive
Valdosta, GA 31605
jonathan.patton@kbr.com
Est. Investment Total = \$40000

Joseph Pearse
629 Vine St
Davenport, IA 52802
563-940-2451
wemac1@mchsi.com
Est. Investment Total = \$3197

Sarah Pearse
deceased 10/1/08
4655 Landau Pl.
Rockford, IL 61114
815-633-5633
greatsavingscb@comcast.net
Est. Investment Total = \$4000

Michelina Principi
50 Warner Rd
Hubbard, OH 44425
330-759-9329
Est. Investment Total = \$40000

Keith Raines
Bonnie C.
1118 Dilton Ave
River Ridge, LA 70123
504-739-9460
kr468@aol.com
Est. Investment Total = \$94768.06

Maria Teresa Ramirez
Est. Investment Total = \$32700

John (III) and Jan Reed
19311 NE 190th St
POB 516
Woodinville, WA 98077
425-788-6303
jarreed@hotmail.com
Est. Investment Total = \$85000

John (IV) and Sarah Reed
2304 S. 79th Ave.
Yakima, WA 98903
509-965-4408
kfed@email.com
Est. Investment Total = \$150000

William & Carolyn S. Richoz
773 Bluff City Blvd
Elgin, IL 60120
847-695-7167
bill@championframe.com
Est. Investment Total = \$22966.84

Calvin Riehl
636 Nebraska Ave
Niles, OH 44446
330-544-0913
Est. Investment Total = \$115919.89

Henry & Satoko Robb
490 31st Ave
#303
San Francisco, CA 94122
415-752-7107
hrobb@fisherinc.com
Est. Investment Total = \$35000

Ronald Rodemeyer
6006 Fox Hill Dr.
Longmont, CO 80501
303-772-4980
mjrrlr@comcast.net
Est. Investment Total = \$35000

Andres Rodriguez
310 Echo Dr
Rockford, IL 61072
815-624-4531
Est. Investment Total = \$10000

Louis & Sophia Rodriguez
5107 Pebble Creek Tr.
Rockford, IL 61110
815-282-4322
lrodri2940@aol.com
Est. Investment Total = \$3600

Louise & Joseph Rodriguez
1429 N. Springfield
Rockford, IL 61101
815-964-3974
lrodri2940@aol.com
Est. Investment Total = \$2500

Travis Ruen
303 Lauder Ave
#703
Moscow, ID 83843
208-892-2801
Est. Investment Total = \$100000

Carl Salas
1706 Southridge Circle
Derby, KS 67037
316-788-3849
carlsalas@hotmail.com
Est. Investment Total = \$2500

Nora Sanata
17922 66th Ave North
Maple Grove, MN 55311
763-229-7500
norasanata@yahoo.com
Est. Investment Total = \$86825

Patrick & Margaret Sanchez
644 Glidden Ave
DeKalb, IL 60115
Est. Investment Total = \$2500

Bradley Schaufenbuel
5009 Cornell Ave
Downers Grove, IL 60515-4314
630-435-5887
bschaufe@hotmail.com
Est. Investment Total = \$17500

Robert Schaufenbuel
2340 16th St NW
Cedar Rapids, IA 52405
319-396-0110
Est. Investment Total = \$17500

William & Linda Schuberth
13191 Hickory Lane
Woodstock, IL 60098
815-338-1586
specs2020@sbcglobal.net
Est. Investment Total = \$135000

John Scott
136 Terrace PL
DeKalb, IL 60115
Est. Investment Total = \$10000

Robin Scott
6316 Blvd of Champions
N. Lauderdale, FL 33068
954-258-2544
hotmalero@b@hotmail.com
Est. Investment Total = \$10036.04

Mary O'Sullivan Snyder
4655 Landau Pl
Rockford, IL 61114
815-633-5633
greatsavingscb@comcast.net
Est. Investment Total = \$20180

Thomas Snyder
4655 Landau Pl
Rockford, IL 61114
815-633-5633
greatsavingscb@comcast.net
Est. Investment Total = \$8061

Neil Steffens
1245 Larkin Ave
Elgin, IL 60123
847-931-7447
Est. Investment Total = \$5000

Joseph Stettheimer
PO Box 65134
Lubbock, TX 79464
806-863-4774
stettheimer@door.net
Est. Investment Total = \$170000

Thomas Stilling
217 E. 10th St. #1
New York, NY 10003
917-754-8722
Est. Investment Total = \$2500

Jagannathan Suchitra
1350 Fox Chase Rd
Bartlett, IL 60103
630-483-1778
Est. Investment Total = \$0

Carol Szili
3169 Halsey Dr NE
Warren, OH 44483
330-395-5740
Est. Investment Total = \$55458.47

Kathleen Tajak
566 Wilshire Ave
Glen Ellyn, IL 60137
630-653-3048
ktajak@msn.com
Est. Investment Total = \$60000

Alvaro Terrazas
1824 Endicott Cir
Carpentersville, IL 60110
847-428-4491
claudia2883@email.msn.com
Est. Investment Total = \$15000

Leobardo Terrazas
883 Dover St
Hampshire, IL 60140
Unpublished
Est. Investment Total = \$15000

Lenore Testa
1714 Howland-Wilson Rd
Warren, OH 44484
330-856-2446
Est. Investment Total = \$108078.76

Melvin Utterback
607 Catalina Ct
The Villages, FL 32159
352-259-7116
mongoosemagoo@aol.com
Est. Investment Total = \$12500

Maria Valentin
32W121 Bode Rd
Elgin, IL 60120
aide_valentin@hotmail.com
Est. Investment Total = \$80000

Ronald & Kandy Vanpeurse
Est. Investment Total = \$40000

Timothy Waychoff
PO Box 72128
Corpus Christi, TX 78472
361-883-4040
Est. Investment Total = \$35000

Andrew & Nancy Weed
3600 Marks Road
Yakima, WA 98903
509-965-4408
ajnjweed@aol.com
Est. Investment Total = \$200000

Vernon Wilder
310 Echo Dr
Rockford, IL 61072
815-624-4531
Est. Investment Total = \$0

Sam Wildofsky
2277 Shrine Rd
Springfield, OH 42205
937-284-2753
yksfodliw@yahoo.com
Est. Investment Total = \$85000

Edward Yakubovich
Est. Investment Total = \$10000

Fong (Richard) & Xinyu Zhu
2937 Polo Club Rd
Nashville, TN 37221
615-370-0653
rzhu01@comcast.net
Est. Investment Total = \$318373.54

Neeraja Jasthi
18312 Bankston Pl.
Tampa, FL 33647
Est. Investment Total = \$10000